

The proposed revised text to CALGreen section 301.4.1, Exception 3, will irreparably harm sites ability to process water into the water table, in conflict with the intentions stated in the MWEL0.

“The new building or addition to an existing building is be partially or entirely constructed on an existing irrigated landscape area equal to or greater than the minimum rehabilitated landscape area requirement of Section 301.4.1.”

This will result in the needless destruction of existing planting areas and result in their replacement with buildings in order to meet the 75% replacement requirement minimum. This wording will result in sites that cycle paved areas into landscape, and landscaped areas into buildings. This will add cost to construction and works against the intention stated in the MWEL0 of looking at planting design from a watershed approach, providing better habitat, protecting native planting, and creating more permeable landscape site soils on a campus, that recharge water tables and store water in landscaped areas.

The result will be that planters are bored out of previously paved areas with compliant new irrigation, and existing planted areas, many of which are likely on original site soil with natural connections to the water table and with living, biologically active soils, will be excavated, lime treated, and destroyed. Please consider wording that does not destroy further our connection to the water table and natural living soil profiles.

Sincerely,
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